

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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FARAH JEAN FRANCOIS,

Case No.: 1:22-cv-4447-JSR

Plaintiff,

-against-

SPARTAN AUTO GROUP LLC d/b/a
VICTORY MITSUBISHI,
STAVROS ORSARIS,
YESSICA VALLEJO, and
DAVID PEREZ,

Defendants.

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DECLARATION OF AHMAD KESHAVARZ AS TO FEE PETITION EXHIBITS

Pursuant to 28 U.S.C. § 1746, AHMAD KESHAVARZ declares under penalty of perjury that the foregoing is true and correct.

1. I am a member of the Bar of this Court and the principal for The Law Office of Ahmad Keshavarz for Plaintiff Farah Jean Francois (“Plaintiff”).

2. I make this Declaration in support of Plaintiff’s Motion for Attorney’s Fees and Costs.

3. I make this Declaration for the purpose of presenting such documents to the Court for consideration in connection with the said motion.

4. Attached hereto as **Exhibit A** is a true and correct copy of the Declaration of Ahmad Keshavarz for Attorney’s Fee Award.

5. Attached hereto as **Exhibit B** is a true and correct copy of the contemporaneously kept billing records reflecting my firm’s services and billing in this litigation. Those documents are incorporated by reference. They are a true and accurate representation of my firm’s work on this

case, and if called to testify I would state the same. Also with the billing records are tables summarizing the total hours worked by counsels of my firm.

6. Attached hereto as **Exhibit C** is a true and correct itemization of expenses incurred by my firm in the prosecution of this case, along with supporting invoices and receipts.

7. Attached hereto as **Exhibit D** is a true and correct copy of the Certification of Andrew Milz, counsel for Plaintiff, with billing records of Flitter Milz, PC in this case.

8. Attached hereto as **Exhibit E** is a true and correct copy of the Certification of Jody Thomas López-Jacobs, counsel for Plaintiff.

9. Attached hereto as **Exhibit F** is a true and correct copy of the Declaration of attorney Seth R. Lesser in support of the attorney fee application of Andrew Milz and Thomas López-Jacobs.

10. Attached hereto as **Exhibit G** is a true and correct copy of the Declaration of attorney Danielle Tarantolo in support of the attorney fee application of Ahmad Keshavarz.

11. Attached hereto as **Exhibit H** is a true and correct copy of the Declaration of attorney Claudia Wilner in support of the attorney fee application of Ahmad Keshavarz.

12. Attached hereto as **Exhibit I** is a true and correct copy of the Declaration of attorney James Fishman in support of the attorney fee application of Ahmad Keshavarz.

13. Attached hereto as **Exhibit J** is a true and correct copy of the Declaration of attorney Emma Catherine in support of the attorney fee application of herself and of Ahmad Keshavarz.

14. Attached hereto as **Exhibit K** is a true and correct copy of the Declaration of attorney Matthew Schedler in support of the attorney fee application of Emma Catherine.

15. Attached hereto as **Exhibit L** is a true and correct copy of the Declaration of attorney Susan Shin in support of the attorney fee application of Emma Catherine.

16. Attached hereto as **Exhibit M** is a true and correct copy of the Declaration of attorney Judith Miller in support of her fee application.

17. Attached hereto as **Exhibit N** is a true and correct copy of the Declaration of attorney Brian Bromberg in support of the attorney fee application of Judith Miller.

18. Attached hereto as **Exhibit O** is a true and correct copy of the Declaration of attorney Carolyn Coffey in support of the attorney fee application of Judith Miller.

19. Attached hereto as **Exhibit P** is a true and correct copy of the May 1, 2024 final demand for mediation, and prior correspondence regarding the same since February 5, 2024.

20. Attached hereto as **Exhibit Q** is a true and correct copy of the February 3, 2023 settlement offer of Defendants for \$45,000.

21. Attached hereto as **Exhibit R** is a true and correct copy of the July 20, 2022 Rule 68 Offer of Judgment by Spartan Auto Group, LLC d/b/a Victory Mitsubishi of \$5,010 plus attorney's fees to date and dismissal of all other Defendants.

WHEREFORE, for the reasons set forth herein and in the accompanying Memorandum of Law, Plaintiff respectfully requests for the Court to grant her application for Attorney's Fees and Costs.

Dated: Brooklyn, New York
December 23, 2024

_____/s/_____
Ahmad Keshavarz
Law Office of Ahmad Keshavarz
16 Court St., 26th Floor
Brooklyn, NY 11241
Attorney for Plaintiffs